

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PATTON BOGGS LLP,

Plaintiff,

v.

CHEVRON CORPORATION,

Defendant.  
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12-CV-9176 (LAK)

**DECLARATION OF RANDY M. MASTRO IN SUPPORT OF  
CHEVRON CORPORATION'S REPLY IN SUPPORT OF ITS  
MOTION FOR LEAVE TO FILE COUNTERCLAIMS**

I, RANDY M. MASTRO, hereby declare under penalty of perjury pursuant to 28 U.S.C.  
§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Chevron Corporation ("Chevron") in the above-captioned matter. I make this declaration, based on personal knowledge, in support of Chevron Corporation's motion for leave to file counterclaims.

2. Attached hereto as **Exhibit 1** is a true and correct copy of The District of Columbia Bar website at [http://www.dcbbar.org/find\\_a\\_member/results.cfm](http://www.dcbbar.org/find_a_member/results.cfm), following a search for Susan Bastress, redacted to remove a street address, last accessed on July 5, 2013.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Maryland Judiciary website at <http://www.courts.state.md.us/cpf/attylist.html>, following a search for Susan Bastress, redacted to remove a street address, last accessed on July 5, 2013.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Bastress & Associates, LLC website at <http://bastressassociates.com/about-us.html>, redacted to remove a street address, last accessed on July 5, 2013.

5. Attached hereto as **Exhibit 4** is a true and correct copy of The Platt Group website at [http://www.theplattgroup.com/index.cfm?fuseaction=page.display&page\\_id=36](http://www.theplattgroup.com/index.cfm?fuseaction=page.display&page_id=36), last accessed on July 5, 2013.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Maryland State Board of Elections website at <https://voterservices.elections.state.md.us/VoterSearch>, following a search for Susan Bastress and her date of birth and zip code, redacted to remove the date of birth and street address, last visited on July 5, 2013.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Maryland Department of Assessments & Taxation website at [http://sdatcert3.resiusa.org/rp\\_rewrite/details.aspx?County=18&SearchType=STREET&AccountNumber=04%20108027](http://sdatcert3.resiusa.org/rp_rewrite/details.aspx?County=18&SearchType=STREET&AccountNumber=04%20108027), redacted to remove the street address and information about the subject property, last visited on July 5, 2013.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Maryland Department of Assessments & Taxation website at [http://sdatcert3.resiusa.org/rp\\_rewrite/details.aspx?County=23&SearchType=STREET&AccountNumber=13%20013551](http://sdatcert3.resiusa.org/rp_rewrite/details.aspx?County=23&SearchType=STREET&AccountNumber=13%20013551), redacted to remove the street address and information about the subject property, last visited on July 5, 2013.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the New York State Unified Court System website at <https://iapps.courts.state.ny.us/attorney/AttorneyDetails?attorneyId=111868051>, redacted to remove a registration number and street address, last visited on July 5, 2013.

10. Attached hereto as **Exhibit 9** is a true and correct copy of The District of Columbia bar website at [http://www.dcbbar.org/find\\_a\\_member/results.cfm](http://www.dcbbar.org/find_a_member/results.cfm), following a search for William L Nash, redacted to remove a street address, last visited on July 5, 2013.

11. Attached hereto as **Exhibit 10** is a true and correct copy of The District of Columbia Board of Elections website at [https://www.dcboee.org/voter\\_info/reg\\_status](https://www.dcboee.org/voter_info/reg_status), following a search for William L Nash and his date of birth and zip code, redacted to remove a Voter ID Number and street address, last visited on July 5, 2013.

12. Attached hereto as **Exhibit 11** is a true and correct copy of a property deed from Montgomery County, Maryland, redacted to remove street addresses and information about the subject property, granting ownership of that property in Bethesda, MD 20816 to William L. Nash, dated August 7, 2007.

13. Attached hereto as **Exhibit 12** is a true and correct copy of a Substitute Trustees' Deed from the Land Records of Frederick County, Maryland, redacted to remove the street address and information about the subject property, granting ownership of that property in Middletown, Maryland 21769 to William L. Nash, dated October 30, 2012.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the Fulton County, Georgia, Board of Assessors website at [http://qpublic9.qpublic.net/ga\\_display\\_dw.php?county=ga\\_fulton&KEY=17+011000040296](http://qpublic9.qpublic.net/ga_display_dw.php?county=ga_fulton&KEY=17+011000040296), redacted to remove the street address and information about the subject property, last visited on July 5, 2013.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the Georgia Secretary of State's website at <http://mvp.sos.state.ga.us/Login.aspx>, following a search for Thomas Wilson of Fulton County, Georgia and his date of birth, redacted to remove a street address, last visited on July 5, 2013.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the Georgia Bar website at <http://dev.gabar.org/MemberSearchDetail.cfm?renderforprint=1&ID=NzY5MzYx>, redacted to remove a street address, last visited on July 5, 2013.

17. Attached hereto as **Exhibit 16** is a true and correct copy of the New York State Unified Court System website at <http://iapps.courts.state.ny.us/attorney/AttorneyDetails?attorneyId=5523249>, redacted to remove a street address, last visited on July 5, 2013.

18. Attached hereto as **Exhibit 17** is a true and correct copy of an article entitled “Why would Patton Boggs ... wade into this?” printed in the Washington Post on June 30, 2013.

19. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts of the deposition of Steven R. Donziger in *Chevron Corp. v. Donziger*, No. 11 Civ. 0691 (LAK) on June 28, 2013, filed under seal pursuant to Protective Order, RICO Dkt. 723.

Executed on July 5, 2013 at New York, New York.

/s/ Randy M. Mastro  
Randy M. Mastro